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12 THE HONORABLE BARBARA ROTHSTEIN
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25 UNITED STATES DISTRICT COURT
26 WESTERN DISTRICT OF WASHINGTON
27 AT SEATTLE
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31 ZACHARY HOOPER, individually and on
32 behalf of all others similarly situated,
33
34 Plaintiff,

35 v.
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37 AMAZON.COM SERVICES LLC, a
38 Delaware Limited Liability Company, and
39 DOES 1-10, inclusive,
40
41 Defendants.

42 No. 2:24-cv-00056
43
44

45 STIPULATED MOTION TO EXTEND
46 TIME TO RESPOND TO COMPLAINT
47 AND ORDER
48
49

50 STIPULATION
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52 Pursuant to Local Rules 7(d)(1) and 10(g), Plaintiff Zachary Hooper and Defendant
53 Amazon.com Services LLC (“Amazon”) hereby jointly stipulate as follows:

- 54 1. On December 6, 2023, Plaintiff filed a Class Action Complaint (“Complaint”)
55 against Amazon in King County Superior Court.
56
57 2. On January 11, 2024, Amazon removed this matter to this Court.
58
59 3. On January 17, 2024, the parties filed a Stipulated Motion to Extend Time to
60 Respond to Complaint, asking the Court to extend Amazon’s time to respond from January 18,
61 2024 to February 26, 2024. Dkt. #6. The Court granted the parties’ Stipulated Motion. Dkt. #11.
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64 STIPULATED MOTION TO EXTEND
65 RESPONSE DEADLINE (NO. 2:24-CV-00056) – 1

66 Perkins Coie LLP
67 1201 Third Avenue, Suite 4900
68 Seattle, WA 98101-3099
69 Phone: 206.359.8000
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1 4. Since the Court granted the parties' Stipulated Motion, the parties have conducted
 2 the Rule 26(f) conference and both parties have served discovery. The parties have also met and
 3 conferred, pursuant to the Court's Standing Order, regarding Amazon's intention to file a motion
 4 to dismiss. The parties have also met and conferred about Plaintiff's intention to file a motion to
 5 remand and Plaintiff's requested discovery related to the remand issue.
 6

7 5. In the interest of judicial economy, Plaintiff and Amazon jointly stipulate to
 8 extending Amazon's deadline to respond to the Complaint for 60 days.
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10 6. Good cause supports this joint motion. A brief continuance may reduce or avoid
 11 motions practice because, first, it appears from the conference of counsel that at least portions of
 12 Amazon's motion to dismiss might be avoided by amendment of the Complaint. Second, both
 13 parties intend to evaluate information about the putative class that might obviate—and, at a
 14 minimum, would inform—a motion to remand. Additional time is necessary, however, to collect
 15 and evaluate relevant information about the putative class.
 16

17 7. Therefore, the parties respectfully request a 60-day extension of applicable initial
 18 case deadlines as follows:
 19

	Prior Deadline	New Deadline
Response Deadline	2/26/2024	4/26/2024
Initial Disclosure Deadline	3/8/2024	5/7/2024
Joint Status Report Due	3/15/2024	5/14/2024

40 8. This stipulation is without prejudice to Plaintiff's right to seek remand to Superior
 41 Court.
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STIPULATED MOTION TO EXTEND
 RESPONSE DEADLINE (NO. 2:24-CV-00056) – 2

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5 RESPECTFULLY SUBMITTED this 23nd day of February, 2024.
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Amazon.com Services LLC

**STIPULATED MOTION TO EXTEND
RESPONSE DEADLINE (NO. 2:24-CV-00056) – 3**

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ORDER

Based on the foregoing stipulation, IT IS ORDERED that the case deadlines are amended as follows:

	Prior Deadline	New Deadline
Response Deadline	2/26/2024	4/26/2024
Initial Disclosure Deadline	3/8/2024	5/7/2024
Joint Status Report Due	3/15/2024	5/14/2024

DATED this 23rd day of February 2024.

Barbara Rothstein

Barbara J. Rothstein
United States District Judge

PRESENTED BY:

By: *s/ Andrew E. Moriarty*

Andrew E. Moriarty, WSBA No. 28651

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Attorneys for Defendant Amazon.com Services LLC

**STIPULATED MOTION TO EXTEND
RESPONSE DEADLINE (NO. 2:24-CV-00056) 4**

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CERTIFICATE OF SERVICE

I certify under penalty of perjury that on February 22, 2024, I caused to be electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send a notification of the filing to the email addresses indicated on the Court's Electronic Mail Notice List.

Dated: February 23, 2024.

s/ Rebecca Becken
Legal Practice Assistant

**CERTIFICATE OF SERVICE
(NO. 2:24-CV-00056) – 1**

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